

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

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ALUMINIUM BAHRAIN B.S.C.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:08-cv-299-DWA
	)	
ALCOA, INC., ALCOA WORLD	)	
ALUMINA LLC, WILLIAM RICE and	)	
VICTOR DAHDALEH,	)	
	)	
Defendants.	)	
	)	

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**DEFENDANT VICTOR DAHDALEH'S NOTICE OF MOTION TO DISMISS THE  
AMENDED COMPLAINT, OR IN THE ALTERNATIVE FOR A STAY AND ORDER  
COMPELLING MANDATORY ARBITRATION**

PLEASE TAKE NOTICE that, upon the memorandum of law submitted herewith and the Declaration of Sarah L. Lochner, Esq., dated January 15, 2014, Defendant Victor Dahdaleh will move this Court, before the Honorable Donetta W. Ambrose, at the United States Courthouse, 700 Grant Street, Pittsburgh, Pennsylvania, 15219, at a date and time to be determined by the Court, for an order pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 1 *et seq.*, and Rule 12 of the Federal Rules of Civil Procedure, dismissing the Amended Complaint, dated November 28, 2011, in its entirety, or in the alternative for a stay of all proceedings and an order compelling arbitration and granting such other and further relief as the Court may consider appropriate.

DATED: January 16, 2014

Respectfully submitted,

VICTOR DAHDALEH

By his attorneys,

s/ David J. Berardinelli

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\_\_\_\_\_  
)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of January, 2014, a true and correct copy of the foregoing Notice of Motion to Dismiss the Amended Complaint, or in the Alternative for a Stay and Order Compelling Mandatory Arbitration and the Memorandum of Law, Proposed Order, and exhibits thereto were electronically served by the Court's ECF system upon all counsel of record.

s/ David J. Berardinelli, Esq. \_\_\_\_\_